

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**JOHN WALDRON,**

Plaintiff,

v.

**CHRIS BROWN, ET AL.,**

Defendant.

Case No. 2:22-CV-03556

Judge Edmund A. Sargus, Jr.  
Magistrate Judge Elizabeth P. Deavers

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**DEFENDANT CBE TOURING, LLC'S**  
**NOTICE OF SUBMISSION**

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Defendant CBE Touring, LLC (“CBE Touring”) provides notice to the Court and all parties of the attached “Defendants’ Motion to Dismiss, Plea in Abatement, and Original Answer” (the “Texas Motion”), which was filed in Texas state court. A “Live Performance Agreement” is attached to the Texas Motion.

The Texas Motion was filed after CBE Touring filed its motion to dismiss in the above-captioned case. Accordingly, as noted in CBE Touring’s motion to dismiss, CBE Touring provides this supplement as an update to the Court and to all parties. [See Mot. Dismiss at 21 (“Should such a request be made, CBE Touring will supplement this Motion with a notice of submission.”), Doc. No. 19, Page ID# 71.] Additionally, as referenced in Footnote 2 in CBE Touring’s motion to dismiss, CBE Touring is providing a copy of a “Live Performance Agreement,” which was attached to the Texas Motion. [See Mot. Dismiss at 3 fn. 2 (referring to agreement), Doc. No. 19, Page ID# 53.]

Respectfully submitted,

/s/ William M. Mattes

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**CERTIFICATE OF SERVICE**

I certify that on January 31, 2023, the foregoing was filed through the Court's CM/ECF system, which will provide notice of filing to all parties who have entered an appearance. A copy has also been served on the following by electronic mail:

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*s/ William M. Mattes*  
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